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Attorneys for GEICO ADVANTAGE  
INSURANCE COMPANY erroneously sued and  
served herein as GEICO CASUALTY  
COMPANY

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

BRIAN TERRANCE ALVAREZ-GILBERG,  
an individual,

Plaintiff,

v.

GEICO CASUALTY COMPANY, a foreign  
corporation; DOES I through X; and ROE  
CORPORATIONS I through X, inclusive,

Defendants.

Case No. 2:20-cv-01583-RFB-VCF

**STIPULATION AND ~~PROPOSED~~ ORDER  
TO EXTEND THE DEADLINE TO FILE  
SUPPLEMENTAL BRIEFS ON  
DEFENDANT'S MOTION FOR  
PROTECTIVE ORDER**

Plaintiff, Brian Terrance Alvarez-Gilberg, (hereinafter "Plaintiff"), by through his attorneys  
of record, CLAGGETT & SYKES LAW FIRM, and Defendant Geico Casualty Company,  
("Defendant"), by and through its attorneys of record, McCORMICK, BARSTOW, SHEPPARD,  
WAYTE & CARRUTH LLP., hereby stipulate and extend the deadline to file supplemental briefs,  
in connection with Defendant's Amended Motion for Protective Order, dealing with additional Rule  
30(b)(6) topics.

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1 On June 3, 2022, Plaintiff served Fourth Amended Notice of Taking the Videoconference  
2 and Videotaped Deposition of GEICO Casualty Company's FRCP 30(b)(6) witness(es) ("Fourth  
3 Amended Notice"). The Fourth Amended Notice added several new topics for the deposition of  
4 Defendant's 30(b)(6) witness, some of the topics which Defendant finds objectionable. The parties  
5 met and conferred and agreed that they need additional time to each file a supplemental brief, in  
6 connection with Defendant's Motion for Protective Order.

7 Based on the foregoing, the parties respectfully request that the Court extend the deadline to  
8 file supplement briefs to Defendant's Amended Motion for Protective Order from June 6, 2022 to  
9 June, 17, 2022. The parties request that the Court schedule the hearing on Plaintiff's Motion to  
10 Compel Discovery (Doc. 40) and Defendant's Amended Motion for Protective Order (Doc. 42) to  
11 the next available date convenient to the Court after June 27, 2022.

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**ORDER**

IT IS HEREBY ORDERED that the parties may file supplemental briefs in connection to Defendant's Amended Motion for Protective Order on or before June 17, 2022.

IT IS FURTHER ORDERED the hearing on Plaintiff's Motion to Compel Discovery (Doc. 40) and Defendant's Amended Motion for Protective Order (Doc. 42) be rescheduled to the next available date convenient to the Court after June 27, 2022.

DATED this 7<sup>th</sup> day of June, 2022

DATED this 7<sup>th</sup> day of June, 2022

CLAGGETT & SYKES LAW FIRM

McCORMICK, BARSTOW, SHEPPARD,  
WAYTE & CARRUTH LLP

By /s/ Joseph N. Mott

By /s/ Henry H. Kim

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Attorneys for BRIAN TERRANCE  
ALVAREZ-GILBERG

Attorneys for GEICO ADVANTAGE  
INSURANCE COMPANY erroneously  
sued and served herein as GEICO  
INSURANCE AGENCY INC.

**IT IS SO ORDERED.**

DATED this 8<sup>th</sup> day of June, 2022

IT IS HEREBY ORDERED that the hearing scheduled for June 15, 2022, is VACATED, and RESCHEDULED to a video conference hearing on July 5, 2022 at 1:00 PM.

  
UNITED STATES ~~DISTRICT COURT~~ JUDGE  
MAGISTRATE

**CERTIFICATE OF SERVICE**

I hereby certify that on this 7<sup>th</sup> day of June, 2022, a true and correct copy of **STIPULATION AND PROPOSED ORDER TO EXTEND THE DEADLINE TO FILE SUPPLEMENTAL BRIEFS ON DEFENDANT'S MOTION FOR PROTECTIVE ORDER** was served via the United States District Court CM/ECF system on all parties or persons requiring notice.

By /s/ Laura M. Lybarger

Laura M. Lybarger, an Employee of  
McCORMICK, BARSTOW, SHEPPARD,  
WAYTE & CARRUTH LLP

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